

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
 )  
v. ) Crim. No. 20-cr-10197-LTS  
 )  
JOSHUA TEIXEIRA, et al, )  
 )  
 )  
Defendants. )  
 )

**REVISED OMNIBUS PROTECTIVE ORDER**

In connection with above-entitled case, the parties jointly propose a Revised Omnibus Protective Order (the “Order”) which shall supersede prior Protective Orders entered in this case, and shall apply the following terms:

- 1) All members of the Defense Team shall execute the Agreement to the Terms of the Revised Omnibus Protective Order (the “Agreement”) prior to receiving, accessing and/or reviewing any materials/disclosures marked “Attorneys’ Eyes Only” under this Revised Omnibus Protective Order and/or under prior Protective Orders entered in this case.
- 2) For purposes of this Order and Agreement, the term “Defense Team” shall include attorneys of record, support staff, investigators and any other individuals retained to participate in the defense of this case.
- 3) The Defense Team shall maintain any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only” in accordance with this Agreement and these materials shall be used by the Defense Team solely and exclusively in connection with the litigation and trial of this case.
- 4) Any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only” may be disclosed, discussed and/or shown to any defendant in this case, but **copies of any such materials may not be provided to any defendant in any form**, including electronically, physically, or otherwise in writing, unless otherwise ordered by this Court.
- 5) Any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only” shall not be disclosed and/or transmitted in any way (including in writing, electronically or verbally) to any person other than the Defense Team or the defendants as discussed above, unless otherwise ordered by this Court.
- 6) Absent further Order of the Court, the terms and limitations of this Order and Agreement will continue to be in effect and binding following the termination of the case.

- 7) Execution of this Revised Omnibus Protective Order does not preclude any of the parties to this case, currently or in the future, from seeking leave from the Court to modify the conditions of this Order at a later date.

So Ordered,

Dated:

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The Honorable M. Page Kelley  
United States Magistrate Judge

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FOR THE DISTRICT OF MASSACHUSETTS

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v.	)	CRIMINAL NO. 20-cr-10197-LTS
	)	
JOSHUA TEIXEIRA, et al,	)	
	)	
Defendants.	)	
	)	

**AGREEMENT TO THE TERMS OF THE REVISED OMNIBUS PROTECTIVE ORDER**

I acknowledge and agree that I have reviewed the Revised Omnibus Protective Order, dated \_\_\_\_\_, issued by the Court in the above-referenced case, and agree that I am bound by the terms of the Agreement and corresponding Order.

Counsel for [DEFENDANT NAME]

\_\_\_\_\_  
[ATTORNEY NAME]

Dated: